



July 30, 2004

Dan Holic
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Holic:

The Iowa Department of Natural Resources (DNR) wishes to comment on the U.S. Environmental Protection Agency's (EPA's) Information Collection Request (ICR) 69 Federal Register 30897 pertaining to the June 1st Source Compliance and State Action Reporting for Stationary Sources of Air Pollution. The department supports the right of the citizen's ability to access comprehensive information about the condition of air quality by providing accurate and timely data.

The purpose of the ICR is to seek comment on adding certain reporting requirements to the compliance information presently required by state and local agencies into the Air Facility System (AFS).

EPA Region 7 has an agreement with us on who enters what air compliance information into AFS. Currently, we have only one full time employee to complete all the data entry needs as agreed. Two of the proposed changes directly affect our current responsibilities, significantly impacting our air program resources, potentially increasing DNR's core program costs by 5%.

Reporting of Partial Compliance Evaluations (PCEs) is currently optional. EPA is recommending making this mandatory. PCEs are not clearly defined and can easily pertain to any compliance activity, such as questions from the public and facilities, reports from the facilities, complaints, partial inspections, stack tests, ... any activity. In most cases, this information is already entered into AFS. Because of this, DNR

currently does not enter PCEs. EPA has not clearly defined what PCE applies to and requiring PCE would significantly increase DNR's AFS data entry burden. DNR will not be able to meet the mandatory PCE without additional resources.

Inputting data is currently required within 90-days. EPA is recommending to shorten this to 30-days. EPA states that "a medium-sized universe of sources (having between 151 and 499 major sources) spends an average 337-hours per quarter" entering compliance information into AFS, which equates to approximately 2 to 8-hours per source. EPA is under estimating the amount of time required to enter accurate information into AFS. DNR's experience is 6 to 8-hours to enter compliance information into AFS for each major source. DNR's current data entry efforts meets EPA's current 90-day requirement. DNR will not be able to meet 30-days without additional resources.

Thank you for this opportunity to comment on the ICR. We look forward to working with you and continuing discussions on the reporting requirements in issue. Please do not hesitate to contact Cherity Gabrielle at (515)281-4873 or Christine Paulson at (515)242-5154 should you wish to discuss any of the matters raised in this letter.

Sincerely,

Catharine Fitzsimmons
Bureau Chief
Air Quality
Environmental Services